

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA :

-v.- :

JEFFERSON MORRILL, :

Defendant. :

-----X

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 1/09/2020

1:18-cr-00600-LGS-1  
Judge Lorna G. Schofield

**UNOPPOSED MOTION OF DEFENDANT JEFFERSON MORRILL  
TO MODIFY STANDARD CONDITION OF PROBATION SUPERVISION**

COMES NOW the Defendant, **Jefferson Morrill**, by and through his undersigned counsel, and hereby respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer” to permit Mr. Morrill to travel to the *Sports Licensing & Tailgate Show* in Las Vegas, Nevada, between the dates of January 14 through 18, 2020. (Docket Entry 28 at p. 4). In support hereof, Defendant states as follows:

1. On November 12, 2019, this Court sentenced Mr. Morrill to a one-year term of probation as a result of his conviction for trafficking in counterfeit goods, in violation of 18 U.S.C. § 2320. (Docket Entry 28, *Judgment In A Criminal Case*). The judgment contains *Standard Conditions of Supervision*. *Id.* at p.4. Standard Condition No. 3 precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer.” *Id.*

2. Since Mr. Morrill resides in the Middle District of Tennessee, Mr. Morrill's probation supervision was administratively transferred to the U.S. Probation Office for the Middle District of Tennessee. Mr. Morrill is being supervised by MDTN U.S. Probation Officer Montranese Vinson.

3. As disclosed in Mr. Morrill's Presentence Report, Mr. Morrill owns and operates Rochester Sports, an autographed sports memorabilia company, which sells legitimate, legal, signed sports merchandise. Mr. Morrill needs to attend a sports licensing show in Las Vegas between the dates of January 14 and January 18, 2020. Appended hereto as *Attachment 1* is an excerpt of a brochure which promotes the *Sports Licensing & Tailgate Show* which will be taking place at the Mandalay Bay Convention Center in Las Vegas between January 16 and 18, 2020. (Mr. Morrill needs to travel to Las Vegas on 1/15/2020.) This is the biggest sports memorabilia show in the United States and Mr. Morrill needs to attend in person to meet with vendors and companies to purchase legitimate items upon which real autograph signatures can be affixed and resold.

4. Undersigned counsel has met personally with MDTN Probation Officer Vinson who has authorized counsel to report that Mr. Morrill has been compliant with his probation supervision in all respects and Ms. Vinson is not opposed to this travel request as long as the Court approves the travel consistent with Standard Condition No. 3.

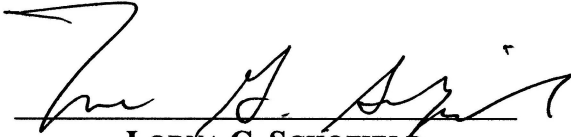
5. Assistant United States Attorney Daniel Nessim has authorized undersigned counsel to report that the government does not oppose this motion.

**WHEREFORE**, based on the foregoing, Defendant Morrill respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from "leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of

Tennessee] without first getting permission from the court or the probation officer” to permit Mr. Morrill to travel to the *Sports Licensing & Tailgate Show* in Las Vegas, Nevada, between the dates of January 14 through 18, 2020.

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 33.

Dated: January 9, 2020  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Respectfully submitted,

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S/ Joseph W. Fuson  
JOSEPH W. FUSON

Attorneys for Defendant Morrill

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system, if registered, or, if unregistered in the Court's system, it has been sent via facsimile and deposited in the United States Mail, postage prepaid, to:

Daniel G. Nessim  
Assistant United States Attorney  
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, NY 10007

**VIA EMAIL**

Montranese Vinson  
U.S. Probation Officer  
Middle District of Tennessee  
montranese\_vinson@tnmp.uscourts.gov

This 7th day of January, 2020.

/s/ Peter J. Strianse  
PETER J. STRIANSE

# SPORTS LICENSING &

PREVIEW 2020

## KEYNOTE & BREAKFAST

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## SLTS 2020 EXHIBITOR PREVIEW

## LICENSE TO BUY

*Earn Money Back on Orders You Write*

## GAME CHANGERS FOR THE SPORTS LICENSING BUSINESS

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to Deliver Keynote Address*

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AND  
TAILG  
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ROCHESTER SPORTS  
103 PADDOCK PLACE DR  
MOUNT JULIET TN 37122-6606

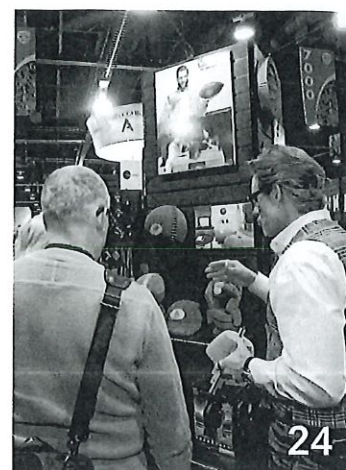
**JANUARY 16-18, 2020  
MANDALAY BAY CONVENTION CENTER  
LAS VEGAS, NV**

**FEATURES**

**INDUSTRY BREAKFAST  
& KEYNOTE:**  
NPD'S DIRK SORENSON



**EDUCATIONAL  
SESSIONS**



**EXHIBITOR  
PROFILES**

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**SPORTS TAILGATE  
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San Juan Capistrano, CA 92675  
(949) 226-5700

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**EXHIBIT SALES**

Sales Director: Matt Lawson  
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